

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

DEBORAH WELLS,

Plaintiff

VS.

CIVIL ACTION NO: 04-CV-10164-MEL

HALLMARK HEALTH SERVICES INC.,

Defendant

## THE PARTIES' JOINT RULE 26(f) REPORT OF DISCOVERY PLANNING CONFERENCE

Now come the parties to the above captioned matter and herewith file a report of their Fed. R. Civ. P. Rule 26(f) Discovery Planning Conference.

The conference took place on May 19, 2004, and all parties were represented at the conference by their respective counsel of record. After good faith discussions concerning the nature of the case and the scope of expected discovery, the parties offer the following proposed discovery plan:

- 1) All Rule 26(a)(1) disclosures shall be served on or before June 30, 2004;
- 2) All interrogatories and Rule 34 requests for production of documents shall be served on or before August 15, 2004;
- 3) All fact depositions shall be concluded on or before January 30, 2005;
- 4) Expert disclosure of fact experts shall be completed on or before February 28, 2005;
- 5) All dispositive motions shall be filed on or before March 31, 2005;

6) Expert disclosure of damage experts shall be completed on or before May 30, 2005;

7) Expert depositions shall be completed by June 30, 2005.

The parties will submit signed certifications in accordance with Local Rule 16.1(D)(3) at or before the Scheduling Conference.

The Parties,  
By their attorneys

DEBORAH WELLS, plaintiff

“/s/”

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HALLMARK HEALTH SERVICES INC.,  
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Dated : May 19, 2004